

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

- - - - -x  
STALIN RODRIGO REYES ESPINOZA,  
Plaintiff,

-against-

DAVS PARTNERS LLC AND KALNITECH  
CONSTRUCTION COMPANY,

Defendants.

- - - - -x  
Veritext Virtual

March 24, 2022

11:09 a.m.

CONTINUED EXAMINATION BEFORE TRIAL of  
STALIN RODRIGO REYES ESPINOZA, the  
Plaintiff in the above-entitled action,  
held at the above time and place, taken  
before Carol Ellinghaus, a Notary Public  
of the State of New York, pursuant to an  
Order and stipulations between Counsel.

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2 APPEARANCES:

3 GORAYEB & ASSOCIATES, PC  
4 Attorneys for Plaintiff  
5 100 William Street, Ste. 1900  
6 New York, New York 10039

7 BY: KENNETH KLEIN, ESQ.

8 RICHMAN & LEVINE, PC  
9 Attorneys for Defendant  
10 Dava Partners, LLC  
11 666 Old Country Road  
12 Garden City, New York 11530

13 BY: KEITH RICHMAN, ESQ.

14 LAW OFFICE OF MICHAEL SWIMMER  
15 Attorneys for Defendant  
16 Kalnitech Construction Company  
17 605 3rd Avenue, 9th Floor  
18 New York, New York 10158

19 BY: ROBERT BRIGANTIC, ESQ.

20 ALSO PRESENT: Alice Dow,  
21 Spanish Interpreter

22 \* \* \*

1 S. Espinoza

2 Q. Was it the day before June 28 or  
3 something else?

4 A. It could have been during that  
5 week but I don't remember exactly.

6 Q. On June 28, 2019, the day of the  
7 accident on Friday, what time did you  
8 arrive at the building approximately?

9 A. At eight in the morning.

10 Q. How did you get there?

11 A. They brought me in a van.

12 Q. At that time you were working  
13 for Jim Associates?

14 A. Yes.

15 Q. Were there other Jim Associates  
16 employees or personnel on the job site on  
17 the day of the accident, June 28?

18 A. Yes.

19 Q. Tell me their names.

20 A. No, I cannot because I don't  
21 know everyone's name and I don't remember.

22 Q. How many other people were there  
23 from Jim Associates in addition to  
24 yourself?

25 A. Just give me a minute so I can